

## OVERVIEW

The AFF respects the privacy of members' personal information in its care. This commitment is set out here in this Privacy Policy that describes how the AFF deals with personal information.

This Privacy Policy relates to personal information that the AFF collects and handles about Registered Fencers ("members") and visitors to its website, apps, social media and other digital services, including those of the State Fencing Associations ("Members").

Registered Fencers who do not agree to the terms of this Privacy Policy may terminate their registration at any time.

## TYPES OF PERSONAL INFORMATION COLLECTED

The types of personal information the AFF collects include name, contact details, identification information (including passport data and member photographs), payment and transaction details/history, membership details relating to National and International fencing bodies, authorisations, records of member communications and interactions with the AFF program, and details/history of preferences, interests and behaviour relating to transactions, products, services, activity with its digital services, sporting performance and results, and data associated with the High Performance Program.

The AFF may not be able to provide its services without member personal information. For example, the AFF may not be able to allow event entry (competitions, camps, etc.), accept overseas event or High Performance Program nominations, manage member membership, or contact you. As a result, the AFF will not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of the AFF's functions or activities.

The AFF will take such steps as are reasonable in the circumstances to protect member personal information from misuse, interference and loss; and from unauthorised access, modification or disclosure. It will also endeavour to ensure that third party holders of that personal information similarly protect member personal information.

## HOW PERSONAL INFORMATION IS COLLECTED AND HELD

The AFF may collect member personal information, and that of other members of the fencing community, from member interactions and transactions with the AFF directly through its portal, from Members, from its contactors and agents, and through third parties specifically requested to collect member data. This includes: nomination or registration for events; undertaking a transaction online;

making a non-cash payment; participating in a competition or survey; registering for services; and using related digital services. The AFF may monitor and record member communications (including email and telephone) for security and dispute resolution. The AFF may also collect personal information from third parties including public sources, information service providers, providers who administer AFF-branded products and services, and anyone authorised to act on a member's behalf.

The AFF holds personal information electronically and in hard copy form, both at its own premises and with the assistance of its service providers. The AFF implements a range of measures to protect the security of that personal information. The AFF also take measures in respect of destroying or de-identifying personal information that is no longer needed for any lawful purpose.

## **PURPOSES FOR HANDLING PERSONAL INFORMATION**

The AFF handles member personal information in connection with providing, administering, improving and personalising AFF products and services. This can include processing payments, delivering orders, managing promotions, providing refunds and discounts, verifying member identity, applying for international and regional fencing licences and memberships, capturing nominations and registrations for local and international fencing and fencing-related events, communicating with members (including direct marketing), conducting product and market research, maintaining and updating its records, dealing with enquiries from members, and working with its service providers.

The AFF may also handle member personal information to protect its lawful interests and to undertake activities in relation to its Member Protection Policy.

The AFF may provide marketing communications and targeted advertising to members on an ongoing basis by telephone, electronic messages (for example, email), through its digital services, and by other means. Members can contact the AFF using the email address [privacy@fencing.org.au](mailto:privacy@fencing.org.au) at any time to opt out of electronic and telephone direct marketing communications. The AFF may need to be able to contact members by post to manage member membership. If members do not want the AFF to send any postal communications, they may terminate membership.

Where members provide the AFF with personal information about a third party, they must have the consent of the third party, or be a legal guardian of that third party. The AFF will not communicate with any third parties regarding member personal information unless it has received consent from the member specifically about that communication, and the AFF may choose regardless not to communicate with third parties regarding members on the basis of this Policy.

## **SHARING OF PERSONAL INFORMATION**

The AFF may exchange member personal information with service providers engaged to assist with services including data processing, data analysis, credit reporting, online computing, printing, contact centre, legal, accounting, business consulting, marketing, research, auditing, archival, delivery, security, investigation, athlete travel, and mailing services.

The AFF takes steps to ensure that all its service providers agree to protect the privacy and security of member personal information, and use it only for the purpose for which it is disclosed.

The AFF shares member information with overseas entities for the purposes of assisting local athletes with overseas competitions, tours, and associated activities. Specifically, the AFF may share member information with the Federation d'Esclime International, the European Fencing Confederation and National Fencing Federations, in addition to accommodation, transport and event management entities engaged by these organisations.

## **DIGITAL SERVICES**

The AFF provides information and services through a range of digital and online services including websites (e.g. [www.fencing.org.au](http://www.fencing.org.au)), apps, email, online advertisements, IPTV, third party registration and membership facilities, transaction gateways ("portals"), and social media profiles. These are generally grouped under the term "Digital Services".

AFF Digital Services may use "cookies". A cookie is a piece of information that allows the server to identify and interact more effectively with member device. The cookie assists the AFF in maintaining the continuity of a member browsing session (e.g. to maintain a shopping cart) and remembering member details and preferences when the member returns to a particular web site. Other technologies that may be used with AFF Digital Services include web beacons (which may operate in conjunction with cookies), Flash local stored objects, and JavaScript. Members can configure their web browser to reject and delete cookies and block these technologies, but may find some parts of AFF Digital Services then have limited functionality.

AFF systems may record a variety of information in relation to interactions with its online services. This can include information about software versions used, device types, device identifiers (like IP address), location data (where available and not disabled by the user), dates, times, file metadata, referring website, data entered, and user activity such as links clicked.

In some cases, third parties may use cookies and other technologies, such as those described above, as part of AFF Digital Services. These technologies may be used in connection with activities like surveys, online behavioural advertising, website analytics, and email campaign management, and members may need to opt out separately from each service.

Some information the AFF collects in relation to AFF Digital Services is not related to an individual. In many cases, the information relates only to a device or is of an aggregated or statistical nature, and the AFF will have no way of knowing the identity of the user. In other cases, the AFF may associate information about member use of AFF Digital Services over time with member personal information.

The AFF's online services may contain links to other sites (e.g. athlete sponsors). The AFF is not responsible for the privacy practices or policies of those sites and recommends that members review their privacy policies.

## **PROCEDURES FOR ACCESS, CORRECTION, AND FEEDBACK**

If members wish to access or correct any personal information the AFF holds about them or have any feedback or concerns about privacy, they should use contact details as set out below.

Where a response is sought from the AFF, it will let the member know who will be handling a member matter and when they can expect a full response, respecting the fact that the AFF is a volunteer organisation and its resource availability may cause delays in responding to members. In the case of access and correction requests, the AFF needs to be provided with as much detail as possible about the particular information being sought in order to help retrieve it. Under the Privacy Act and other relevant laws, the AFF is required to provide its reasons if the AFF refuses a member request. Where the AFF decides not to make a requested correction and a member disagrees, that member may regardless request that the AFF makes a note of member requested correction with the information.

## **CONTACT AND COMPLAINTS**

Queries regarding privacy should be directed to the AFF Privacy Officer via (in the first instance) [privacy@fencing.org.au](mailto:privacy@fencing.org.au).

Any member who believes that the AFF has breached the Australian Privacy Principles, or this Policy, should correspond with the AFF by emailing [privacy@fencing.org.au](mailto:privacy@fencing.org.au). The complaint will then be dealt with in the first instance by the Executive of the AFF, who may then determine, in their absolute discretion, to:

- (a) dismiss the complaint, providing such reasons as it believes are necessary to provide; or
- (b) act on the complaint by rectifying the breach on a "best efforts" basis; or
- (c) refer the complaint to a third party supplier to resolve as per the third party's privacy policy.